

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 13
Charles P. Simon	:	
Patricia M. Simon	:	Case No.: 19-17669-AMC
Debtor(s)	:	

PRAECIPE TO WITHDRAW

Kindly withdraw the Motion to Modify Plan and Notice of Motion filed
at Docket Entries #54, #55 as well as the Praecipe to Withdraw filed at
Docket Entry #58.

DATED: 6/10/2021

BY: /s/ Brad J. Sadek
Brad J. Sadek, Esq.
Sadek and Cooper Law Offices
1315 Walnut Street, Suite 502
Philadelphia, PA 19107
215-545-0008
Attorney for Debtors